

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

JOSEPH L. CARPENTER, an individual;

Plaintiff,

v.

<myschool.com>, a domain name;

Defendant.

Case No.: 1:15-CV-212-AJT/JFA

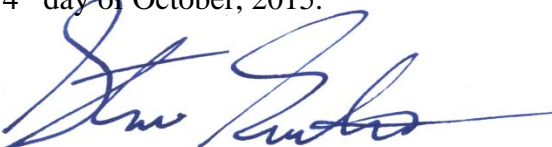
**MOTION TO REOPEN LIMITED FACT DISCOVERY**

Plaintiff moves this Court to reopen limited fact discovery with respect to the date Original Web Ventures (OWV) received actual notice of Plaintiff's mark (Reg. No. 3,358,160) and the First UDRP case by filed by Plaintiff in 2010 against the previous registrant of the *res* domain name <myschool.com>.

The grounds supporting this Motion are set forth in the accompanying Memorandum of Law.

DATED this the 14<sup>th</sup> day of October, 2015.

/s/



Steven Rinehart (VSB No. 81,738)

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 14, 2015 a copy of the foregoing **MOTION TO REOPEN LIMITED FACT DISCOVERY** was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

/s/ Steven Rinehart  
Steven Rinehart